REMARKS

This Application has been carefully reviewed in light of the Official Action mailed December 29, 1997. In order to advance prosecution of this case, Applicant amends Claims 1, 9-11, 16, 19, and 25 in order to clarify and further describe the various inventive concepts. Applicant adds new Claims 26-28 to further describe patentably distinguishable features of Applicant's invention. Claims 26-28 contain no new matter and are fully supported by Applicant's specification as originally filed. (See, e.g., page 9, lines 10-26 and page 12, line 30 through page 14, line 13). Applicant respectfully requests reconsideration and favorable action in this case.

Section 112 Rejections

The Examiner rejects Claims 9 and 10 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Applicant amends Claims 9 and 10 and, therefore, respectfully requests reconsideration of the rejection of Claims 9 and 10 under 35 U.S.C. § 112, second paragraph.

Section 103 Rejections

The Examiner rejects Claims 1-7, 11-14, and 19-22 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,675,745 issued to Oku, et al. ("*Oku*") in view of U.S. Patent No. 5,263,126 issued to Chang ("*Chang*"). Applicant respectfully requests reconsideration of this rejection of Claims 1-7, 11-14, and 19-22.

At the outset, Applicant respectfully submits that the
Examiner withdraw the *Oku-Chang* combination as improper.
Applicant posits that there is no basis in the prior art to
combine *Oku* and *Chang*. To combine prior art in order to
defeat an application under 35 U.S.C. § 103, "there must be
some suggestion or motivation, either in the references
themselves or in the knowledge generally available to one of
ordinary skill in the art, to modify the reference or to
combine reference teachings." (Manual of Patent Examining
Procedure (MPEP) §2143). Additionally, the teaching or
suggestion to make the asserted combination of prior art must
be found in the prior art, not in the application's
disclosure. MPEP §2143 (citing *In re Vaeck*, 947 F.2d 488, 20·
USPQ2d 1438 (Fed. Cir. 1991)). Applicant respectfully submits
that no suggestion, teaching, or motivation exists in the
prior art to combine *Oku* and *Chang*.

Oku relates in general to the field of organization
activity databases, and more particularly to a method for
constructing an organization activity database "for
registering ... pieces of information generated in the process
of various organization activities." (Column 1, lines 10-29).
Chang relates to computer systems, and more particularly to
expert systems that "perform reasoning in the same manner as
human experts." (Column 1, lines 5-11). There is no explicit
or implicit reference to "knowledge management" within *Chang*
which would suggest to one of ordinary skill in the claimed
art of "knowledge management systems" to combine *Chang* with
Oku.

Chang is not only outside the field of technology of the claimed invention, it does not even contemplate the same problems presented by knowledge management systems solved by the claimed invention, such as, for example, locating and acquiring information requested by and relevant to a particular user. On the contrary, *Chang* is limited to performing a predefined action if a query matches a row of a predefined and static truth table. (Column 8, lines 28-34). "The action may be an action instruction printed on the screen..." or the action "may start some other computer program..." (Column 8, lines 2-6). For example, an action taken by an expert system that is trouble shooting a printer is an instruction that the printer is "Out of Paper," and that the operator of the printer must "Load New Paper." (Figure 8a). All actions performed by the expert system are previously inputted by the user in separate rows of a static action table. (Column 8, lines 30-34). A particular action is performed if its associated row corresponds to the row of the truth table that matches the query. (Column 8, lines 28-30).

Furthermore, although the Examiner states that *Oku* does not disclose the internal makeup of its databases, *Oku* describes in a rather lengthy and complex discussion "a data modeling method necessary for constructing an object-oriented database" for use in the object-oriented database management system. (Column 9, lines 1-5). In particular, *Oku* discloses four underlying concepts of its object-oriented database (column 9, lines 7-49), the basic concept of data modeling employed for the objected-oriented database for the system (column 9, line 54 through column 10, line 44), and the structural model of the database (column 10, line 44-65;

column 13, lines 13-52; and column 14, line 60 through column
15, line 31). Significantly, *Oku* limits the use of its
organization activity management system to databases
"constructed by the data modeling technique of the invention."
(Column 20, line 61 through column 21, line 4). Therefore,
not only does *Oku* describe a method for modeling and the
structure of its databases for use in the organization
activity management system, but it teaches away from using
other types of databases in the system. A person of skill in
the art after reading *Oku* would not be motivated to adopt any
other database structure other than the specific structure
disclosed in *Oku*. As a result, Applicant respectfully submits
that the *Oku-Chang* combination is improper and, therefore,
does not render Claims 1-7, 11-14, and 19-22 obvious under 35
U.S.C. § 103.

Moreover, the improper *Oku-Chang* combination still does
not teach, suggest, or disclose the claimed aspects of
Applicant's invention. *Oku* is limited to performing simple
query and retrieve functions. For example, *Oku* teaches
retrieving information by "entering a word expressing [one of]
the basic concepts of person, organization, article, document,
meeting and event, and actions..." (Column 21, line 8-13).
This activates a retrieval function that uses the basic
concept chosen by the user as a retrieval key. (Column 21,
lines 13-26).

Applicant notes that *Oku*, standing alone, does not teach,
suggest, or disclose a "knowledge matrix." As such, the
Examiner relies solely on *Chang* to teach this inventive
concept. *Chang* discloses a static, predefined truth table and

an automatic inference engine that processes the information
stored in the truth table according to a query to perform a
predefined action based upon the results of the query.
(Column 4, line 50 through column 5 line 38). *Chang*
contemplates none of the fundamental operations of a knowledge
management system, such as, for example, receiving a request
for information and acquiring information to satisfy the
request. Furthermore, *Chang* does not contemplate tracking or
dynamically storing the status of the requested information or
generating a second request based upon the availability of the
previously requested information. On the contrary, *Chang* is
limited to performing a predefined action if a query matches a
good row of a static, predefined truth table.

Although Applicant believes that Claims 1, 11, and 19 are
patentably distinct from the *Oku-Chang* combination, Claims 1,
11, and 19 have been amended in order to clarify various
inventive concepts. Amended Claim 1 recites, in part, "a
server coupled to the client and operable to receive the first
request, the server comprising a knowledge matrix operable to
store status information on a plurality of knowledge items
associated with the first request, the server operable to
generate a second request for the knowledge items if the
status information stored in the knowledge matrix indicates
the availability of the knowledge items." The *Oku-Chang*
combination fails to teach, suggest, or disclose these aspects
of the claimed invention. Applicant therefore respectfully
requests reconsideration and the allowance of Claim 1.

Claims 2 and 3 depend on Claim 1, which Applicant has
shown above to be allowable. Applicant therefore respectfully
requests reconsideration and allowance of Claims 2 and 3.

As to Claim 4, *Oku* fails to teach a "knowledge matrix."
In particular, nowhere does *Oku* teach, suggest, or disclose "a
knowledge worker grid operable to identify a plurality of
needs associated with the knowledge worker, the knowledge
worker grid operable to relate the first request to a selected
need; a process grid operable to identify a process item
associated with the selected need; and a data grid operable to
identify a data item associated with the selected need," as
recited, in part, in Claim 4. Significantly, *Oku* fails to
specify what information its event, document, and process
databases identify, and certainly fails to suggest Applicant's
association among knowledge workers, needs, process items, and
data items. *Chang* is limited to an input truth table, an
attribute truth table, and a static, predefined, code truth
table, none of which teach, suggest, or disclose the inventive
concepts of the claimed invention. For these reasons and
because Claim 4 depends on Claim 1, which Applicant has shown
above to be allowable, Applicant respectfully requests
reconsideration and allowance of Claim 4.

As to Claim 5, the *Oku-Chang* combination fails to teach,
suggest, or disclose "a process cycle grid operable to store
status information on a step of the identified process item;
and a data cycle grid operable to store status information on
an instance of the identified data item," as recited, in part,
in Claim 5. Additionally, Applicant respectfully notes that
"a batch file ... in the form of a grid ..." used "to identify
the needs of the client," as proposed by the Examiner, does
not teach, suggest, or disclose these inventive concepts of
the claimed invention. For these reasons, and because Claim 5
depends on Claim 1, which Applicant has shown above to be

allowable, Applicant respectfully requests reconsideration and
allowance of Claim 5.

As to Claim 6, the *Oku-Chang* combination fails to teach
"status information." In particular, nowhere does the *Oku-
Chang* combination teach, suggest, or disclose "an execution
flag associated with a step of a process item; and a data
identifier associated with an instance of a data item," as
recited, in part, in Claim 6. Again, Applicants respectfully
note that "a batch file ... in the form of a grid ..." used
"to identify the needs of the client," as proposed by the
Examiner, does not teach, suggest, or disclose these inventive
concepts of the claimed invention. For these reasons and
because Claim 6 depends on Claim 1, which Applicant has shown
above to be allowable, Applicant respectfully requests
reconsideration and allowance of Claim 6.

Claim 7 depends on Claim 1, which Applicant has shown
above to be allowable. Applicant therefore respectfully
requests reconsideration and allowance of Claim 7.

Amended Claim 11 recites, in part, "a knowledge matrix
operable to store status information on a plurality of
knowledge items associated with a first request; and a control
module coupled to the knowledge matrix and operable to receive
the first request from a client associated with the knowledge
worker, the control module further operable to generate a
second request for the knowledge items if the status
information stored in the knowledge matrix indicates the
availability of the knowledge items, the control module
further operable to receive information in response to the
second request." For the reasons set forth above in regards

to Claim 1, Applicant respectfully requests reconsideration and allowance of amended Claim 11.

Claim 12 depends on Claim 11, which Applicant has shown above to be allowable. Applicant therefore respectfully requests reconsideration and allowance of Claim 12.

For the reasons set forth above with regards to Claim 4, and because Claim 13 depends on Claim 11, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 13.

For the reasons set forth above with regards to Claim 5, and because Claim 14 depends on Claim 11, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 14.

Amended Claim 19 recites, in part, "receiving a first request from a client associated with the knowledge worker; retrieving, from a knowledge matrix, status information on a plurality of knowledge items associated with the first request; generating a second request for the knowledge items. if the status information received from the knowledge matrix indicates the availability of the knowledge items; and receiving information related to the knowledge item in response to the second request." For the reasons set forth above in regards to Claim 1, Applicant respectfully requests reconsideration and allowance of Claim 19.

As to Claim 20, *Oku-Chang* fails to teach "relating the first request to a selected one of a plurality of needs associated with the knowledge worker; retrieving a process item associated with the selected need; and retrieving a data item associated with the selected need," as recited, in part, in Claim 20. For these reasons and because Claim 20 depends

on Claim 19, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 20.

As to Claim 21, *Oku-Chang* fails to teach "relating the first request to a selected one of a plurality of needs associated with the knowledge worker; retrieving a process item associated with the selected need; retrieving a data item associated with the selected need; retrieving status information on a step of the identified process item; and retrieving status information on an instance of the identified data item," as recited, in part, in Claim 21. For these reasons and because Claim 21 depends on Claim 19, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 21.

For the reasons set forth in regards to Claim 6, and because Claim 22 depends on Claim 19, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 22.

The Examiner rejects Claims 8, 18, and 23 under 35 U.S.C. § 103(a) as being unpatentable over *Oku* in view of *Chang* and U.S. Patent No. 5,548,506 issued to Srinivasan ("*Srinivasan*"). Applicant respectfully requests reconsideration of this rejection of Claims 8, 18, and 23.

At the outset, Applicant respectfully submits that the Examiner withdraw the *Oku-Chang-Srinivasan* combination as improper. *Srinivasan* has nothing to do with knowledge workers or knowledge worker views so that a person of ordinary skill

in the art would not be motivated to combine *Srinivasan* with any other references.

Moreover, the improper *Oku-Chang-Srinivasan* combination still does not teach, suggest, or disclose the claimed aspects of Applicant's invention. *Srinivasan* teaches the use of passwords for authorization of all input mail or faxes. "For electronic mail and faxes, the incoming mail is checked against a valid list of passwords prior to processing." (Column 3, lines 33-36). Nowhere does *Srinivasan* teach, suggest, or disclose the use of personal or default profiles. Furthermore, since profiles are not necessary to authorize incoming mail or faxes, incorporating profiles into the system of *Srinivasan* provides no more security than passwords alone. On the contrary, maintaining profiles in *Srinivasan* occupies valuable memory while serving no identifiable purpose. In fact, *Srinivasan* teaches away from the use of default profiles because they are not specific to any particular user and are therefore inoperable to provide authorization for incoming mail. Nowhere does the *Oku—Chang—Srinivasan* combination teach, suggest, or disclose "a plurality of personal profiles, each personal profile identified by a knowledge worker identifier that specifies the knowledge worker and a selected knowledge worker view; and a plurality of default profiles, each default profile associated with a corresponding knowledge worker view," as recited in Claim 8. For these reasons, and because Claim 8 depends on Claim 1, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 8.

For the reasons set forth above in regards to Claim 8, and because Claim 18 depends on Claim 11, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 18.

For the reasons set forth above in regards to Claim 8, and because Claim 23 depends on Claim 19, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 23.

The Examiner rejects Claims 9, 15, 17, and 24 under 35 U.S.C. § 103(a) as being unpatentable over *Oku* in view of *Chang*, *Srinivasan*, and U.S. Patent No. 5,499,340 issued to Barritz ("*Barritz*"). Applicant respectfully requests reconsideration of this rejection of Claims 9, 15, 17 and 24.

At the outset, Applicant respectfully submits that the Examiner withdraw the *Oku-Chang-Srinivasan-Barritz* combination as improper. The Examiner relies on four disparate references that offer no motivation to combine with any other references, nor do any of them deal with knowledge management systems.

Moreover, the improper *Oku-Chang-Srinivasan-Barritz* combination still does not teach, suggest, or disclose the claimed aspects of Applicant's invention. *Barritz* is limited to monitoring the execution of computer programs to determine the actual usage of particular software products. (Column 2, lines 57-65). In particular, *Barritz* monitors the instantiation of previously identified executable files. (Column 4, line 64 through column 5, line 18). *Barritz* discloses separating executable files, such as software programs, from non-executable files, such as databases, and monitoring only the executable files. (Column 4, line 64

through column 5, line 18). By limiting the scope of monitoring to the instantiation of executable files only, *Barritz* is inoperable "to generate access statistics in response to the interaction between the client and the server," as recited, in part, in Claim 9. For these reasons and because Claim 9 depends on Claim 1, Applicant respectfully requests reconsideration and allowance of Claim 9.

For the reasons set forth above in regards to Claim 9, and because Claim 15 depends on Claim 11, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 15.

As to Claim 17, Applicant respectfully notes that *Oku* fails to disclose a system with a "pending matters" section. Rather, *Oku* teaches a system with a "depending matters" section. In particular, Applicant refers the Examiner to Figures 60 and 61 to clarify the inaccurate references to "pending matters" at Column 23, lines 31-36 in *Oku*. Therefore, *Oku* fails to teach, suggest, or disclose "pending modules" or "pending queues." *Srinivasan* is limited to reminding task leaders about start and finish dates associated with pending tasks, (column 3, lines 6-8), but fails to teach, suggest, or disclose "pending modules" or "pending queues." Furthermore, as stated above, *Barritz* teaches away from monitoring non-executable files such as databases. Nowhere does the *Oku-Srinivasan-Barritz* combination teach, suggest, or disclose "a pending module coupled to the control module, the pending module operable to identify an unavailable knowledge item; and a pending queue coupled to the pending module inoperable to store information on the unavailable knowledge

item," as recited, in part, in Claim 17. For these reasons
and because Claim 17 depends on Claim 11, which Applicant has
shown above to be allowable, Applicant respectfully requests
reconsideration and allowance of Claim 17.

For the reasons set forth above with regard to Claim 17,
and because New Claim 26 depends on Claim 6, New Claim 27
depends on Claim 11, and New Claim 28 depends on Claim 19, all
of which Applicant has shown above to be allowable, Applicant
respectfully requests reconsideration and allowance of New
Claims 26, 27, and 28. Support can be found for New Claims
26-28 in Applicant's specification, as originally filed, on
page 9, lines 10-26 and page 12, line 30 through page 14, line
13.

For the reasons set forth above with regard to Claim 9,
and because Claim 24 depends on Claim 19, which Applicant has
shown above to be allowable, Applicant respectfully requests
reconsideration and allowance of Claim 24.

The Examiner rejects Claims 10, 16, and 25 under 35
U.S.C. § 103(a) as being unpatentable over *Oku* in view of
Chang, *Srinivasan*, *Barritz*, and U.S. Patent No. 5,410,344
issued to Graves, et al. (*"Graves"*). Applicant respectfully
requests reconsideration of this rejection of Claims 10, 16,
and 25.

At the outset, Applicant respectfully submits that the
Examiner withdraw the *Oku-Chang-Srinivasan-Barritz-Graves*
combination as improper. The Examiner now relies on five
disparate references that offer no motivation to combine with
any other references. *Graves* relates to the field of
television media, and more particularly to selecting
television programs based on program content and viewer

preference. (Column 1, lines 8-10). There is no explicit or implicit reference to "knowledge management" within *Graves* which would suggest to one of ordinary skill in the claimed art of knowledge management systems to combine *Graves* with any other references.

Moreover, the improper *Oku-Chang-Srinivasan-Barritz-Graves* combination still does not teach, suggest, or disclose the claimed aspects of Applicant's invention. Applicant notes that the *Oku-Chang-Srinivasan-Barritz* combination does not disclose modifying a profile. As such, the Examiner relies solely on *Graves* to teach this inventive concept.

Graves is limited to modifying a preference file that is generated by soliciting information from a user by a variety of techniques, "including a mailed questionnaire, telephone interview, or by a television menu controlled by key/remote control input." (Column 5, lines 62-66). Furthermore, *Graves* requires interaction "with the viewer to solicit his/her preferences regarding programs and program attributes" and modifies the preference file in response to the solicited responses. (Columns 6, lines 55-56 and column 7, lines 37-43). For example, *Graves* presents a series of questions to the viewer on the television so that the viewer may answer the questions with an input device such as a keypad or remote control. (Column 6, line 60 – Column 7, line 4). In another embodiment, *Graves* presents a preview channel to the viewer who ranks the displayed programs on a preference scale. (Column 7, lines 5-20). In yet another embodiment, *Graves* interacts with the viewer through a "trivia game show" wherein "inquiries are issued to the viewer so that updated

information is obtained pertaining to the viewer's program preferences." (Column 7, lines 21-36). The preferences solicited from the viewer are used to update or modify the preference file of the viewer to reflect any changes in viewer preference. (Column 7, lines 37-45). Nowhere does *Oku-Chang-Srinivasan-Barritz-Graves* teach, suggest, or disclose a "watch module operable to generate access statistics in response to a knowledge management session between the client and the server, the watch module further operable to modify a personal profile of the knowledge worker in response to the access statistics," as recited, in part, in amended Claim 10. Specifically, any pertinent teachings of the *Oku-Chang-Srinivasan-Barritz-Graves* combination requires solicitation of the viewer particularly for the purpose of gaining viewer preferences. For these reasons and because Claim 10 depends on Claim 1, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of Claim 10.

For the reasons stated above with regard to Claim 10, and because amended Claim 16 depends on Claim 11, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of amended Claim 16.

For the reasons stated above with regard to Claim 10, and because amended Claim 25 depends on Claim 19, which Applicant has shown above to be allowable, Applicant respectfully requests reconsideration and allowance of amended Claim 25.
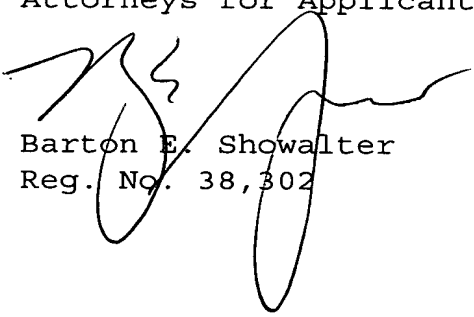
Conclusions

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending Claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

An additional fee in the amount of $66.00 is due to cover the cost of filing three (3) additional dependent claims. The Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 05-0765 of Electronic Data Systems Corporation.

Respectfully submitted,

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